

FLETCHER YODER

Intellectual Property Law

Patents • Trademarks • Opinions • Transactions • IP Strategy

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February 8, 2024

Via e-mail: fdorchak@collardroe.com

Frederick Dorchak
Collard & Roe, P.C.
1077 Northern Boulevard
Roslyn, New York 11576-1614

Re: *U.S. Patent No. 11,751,302*

Dear Mr. Dorchak:

We have been asked by our client, Ms. Christina Lyons of AGS Lighting Management, to respond to your letter of January 25 regarding U.S. Patent No. 11,751,302 (“the ‘302 patent”).

The information you provided regarding your client’s manufacturer, Sundopt LED Lighting Co., Ltd. in China, is appreciated but as you know, under 35 U.S.C. § 271, “whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States, or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.” As a company selling and offering the LIN product for sale in the U.S., Jesco Lighting Group falls within section 271.

Further, we do not agree that the YouTube screen shot you provided with your January 25 letter or the spec sheet provided with your December 7 letter invalidates any claim of the ‘302 patent, which is presumed valid under 35 U.S.C. §282(a).

As our client has expressed to you previously, AGS is prepared to enforce its intellectual property rights through litigation, although prefers to resolve this matter via licensing discussions. Our client has extended multiple offers to engage in licensing discussions and has accommodated your requests for extensions. Unless we hear from you by February 16, we will assume your client

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is not interested in a mutually-agreeable business solution and will take the necessary steps to enforce AGS's patent rights.

Best regards,

A handwritten signature in blue ink, appearing to read "Jayne Piana". The signature is fluid and cursive, with the first name "Jayne" written in a larger, more prominent script than the last name "Piana".

Jayne Piana

cc: Ms. Christina Lyons
Mr. Peter DallePezze